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*NOT ADMITTED IN D.C.

November 27, 2001

Ms. Gloria Blue
Executive Secretary
Trade Policy Staff Committee
Office of the United States Trade Representative.
600 17th Street, N.W.
Washington, D.C. 20508

**Re: Comments on Request for Exclusion from Import Remedy in Connection
with Inv. No. TA-201-73 (Certain Steel Products)**

Dear Madam Secretary:

On behalf of the European Steel Tube Association and Tubeurop, we hereby submit the following comments on exclusion requests in the above referenced investigation. These comments are filed pursuant to the United States Trade Representative's October 26, 2001 Notice in the Federal Register (66 Fed. Reg. 54321).

On November 13, 2001, ESTA and Tubeurop submitted a request to USTR for the exclusion of welded elliptical structural tubing from any relief imposed by the President.

Requests for exclusion of this product had previously been made to the United States

International Trade Commission throughout the remedy portion of the proceedings. To

date, there has been no objection or claim by the domestic industry that they can or do produce such elliptical structural tubing. Even should U.S. producers promise to make these products in the future, Tubeurop points out that the domestic industry has not produced these tubes to date; no U.S. producer has the necessary stretch reduced mill for structural applications, so that none can offer ASTM A501 for structural purposes; and none of these companies have acquired the tooling and equipment necessary to produce such products. Until U.S. manufacturers undertake the development and investments necessary to supply this range of tubes, Tubeurop is the only manufacturer currently able and interested in supplying the American and foreign markets. Inclusion of such products in any remedy would not aid the domestic industry in its adjustment to import competition and would potentially stifle the development of a new market for specially designed products, and cut off yet another outlet for domestic producers who might eventually benefit from new market demand.

Given the apparent lack of interest by the domestic industry and for the reasons contained in ESTA and Tubeurop's November 13, 2001 submission, ESTA and TUBEUROPE request that the Commission exclude "welded elliptical structural tubing" from any remedy recommended in this investigation. Please do not hesitate to contact us if you have any questions regarding this submission

Respectfully submitted,

By: Matthew T. McGrath
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European Steel Tube Association
And Tubeurop